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Subject: DOCKET NO. SDWA-10-2013-0080 / REQUEST FOR SCEHDLUE EXTENSION - Irrigation Water Management Plan Submittal
Date: Tuesday, October 29, 2013 12:39:12 PM
Attachments: [image001.png](#)

Eric, Jennifer, and Rene -

ARCADIS U.S., Inc. (ARCADIS), on behalf of: (1) Cow Palace, LLC; (2) D & A Dairy, LLC (also known as D&A Dairy L.L.C.), George DeRuyter & Son Dairy, L.L.C., and George & Margaret, L.L.C; and (3) Liberty Dairy LLC and its associated dairy facility H&S Bosma Dairy [collectively the "Yakima Valley Dairies"], formally requests a 15-day extension to the submission deadline for the Irrigation Water Management Plan (the "work IWMP"). Currently, the IWMP is required to be submitted to EPA no later than Wednesday, October 30, 2013. ARCADIS is requesting extending the submission deadline to Wednesday, November 20, 2013.

Based on discussions with EPA, ARCADIS prepared and submitted DQOs for the IWMP on September 5, 2013. EPA provided comments to the DQOs on September 30, 2013 letter. These DQOs were developed for the Cow Palace facility in accordance with the "Guidance on Systematic Planning Using the Data Quality Objectives Process (QA/G-4)" (EPA/240/B-06/001, February 2006). Although these DQOs were designed for Cow Palace, the intent was that they would serve as the template for the other dairy facilities. Since receipt of the September 30 letter, ARCADIS has worked to prepare the IWMPs for each facility in accordance with the "Guidance for Quality Assurance Project Plans (QA/G-5)" (EPA/240/R-02/009, December 2002), and "EPA Requirements for Quality Assurance Project Plans (QA/R-5)" (EPA/240/B-01/003, March 2001, reissued May 2006).

Based on the depth and breadth of EPA's comments, significant and substantial changes to the IWMP for each facility are required. By granting this extension, ARCADIS will have the ability to present EPA with a "fully-formed" draft IWMP for each facility that fully addresses EPA comments and provides scientifically sound and technically based methods to manage irrigation water application at each facility. We hope the agency will understand that the IWMP is of significant concern to the Yakima Valley Dairies; implementation of the IWMP will influence the agricultural operations at each facility. Our ability to develop and present a coherent and accurate document will be greatly assisted through this extension.

Thank you for your consideration of this request. If you have any questions, please contact me.

Regards,

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